

EX PARTE OR LATE FILED

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February 3, 1999

BY HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S. W.
Washington, D.C. 20554

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FEB 03 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: Notice of Ex Parte Communication Regarding Telephone
Number Portability, CC Docket No. 95-116**

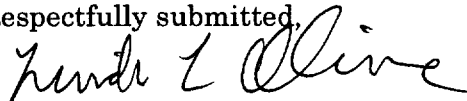
**North American Numbering Council Report Concerning
Telephone Number Pooling and Other Optimization Measures,
NSD File No. L-98-134**

Dear Ms. Salas:

On behalf of the Telecommunications Resellers Association ("TRA"), please include in the record the attached figures which were distributed to Wireless Telecommunications Bureau staff today.

I have hereby submitted two copies of this notice to the Secretary, as required by the Commission's rules. Please return a date-stamped copy of the enclosed (copy provided). Please contact the undersigned if you have any questions.

Respectfully submitted,



Linda L. Oliver
Counsel for Telecommunications
Resellers Association

Enclosures

No. of Copies rec'd 045
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February 3, 1999

BY HAND DELIVERY

Mr. Thomas Sugrue
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room 5002
2025 M Street, N.W.
Washington, D.C. 20554

**Re: Notice of Ex Parte Communication Regarding Telephone
Number Portability, CC Docket No. 95-116**

**North American Numbering Council Report Concerning
Telephone Number Pooling and Other Optimization
Measures, NSD File No. L-98-134**

Dear Mr. Sugrue:

Thanks again for meeting with the Telecommunications Resellers
Association on Monday to discuss the issue of wireless number portability.

As promised, attached are the figures reflecting the costs of
implementing wireless number portability using the TRA-proposed "LRN-Relay"
methodology. 1/ Even if the wireless industry were to pass the entire amount of the
costs on to their customers, the cost to consumers is very low -- only *a nickel a
month* per wireless subscriber (only five dollars per subscriber over a five year

1/ This methodology, described in TRA's November 24, 1998, Report filed in
these dockets, is based on the location routing number (LRN) methodology that has
already been used to implement local wireline number portability.

HOGAN & HARTSON L.L.P.

Mr. Thomas Sugrue

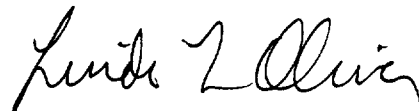
February 3, 1999

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period). The convenience and lower prices that wireless number portability would bring to consumers more than justify this minimal cost.

The Commission owes it to consumers to implement wireless number portability as soon as possible. The TRA alternative methodology would enable the Commission to achieve that goal.

Sincerely yours,

A handwritten signature in cursive script, reading "Linda L. Oliver".

Linda L. Oliver
Counsel for Telecommunications
Resellers Association

Enclosures

cc: Magalie R. Salas, Secretary
Patrick Forster
David Furth
Anna Gomez
Clint Odum
Jeanine Poltronieri
Les Seltzer
James Schlichting
Blaise Scinto
Gayle Radley Teicher
Yog Varma

Telecommunications Resellers Association

LRN Relay Wireless Number Portability Implementation Methodology Cost Estimate

Year	Subscriber Base ¹	Annual Minutes of Use ²
2000	75,460,450	108,663,048,000
2001	86,779,518	124,962,505,200
2002	99,796,445	143,706,880,980
2003	109,776,090	158,077,569,078
2004	120,753,699	173,885,325,986
2005	132,829,068	191,273,858,584
Total Minutes Over 5 Years		791,906,139,828
Total 5-Year Implementation Cost ³		\$ 359,581,715.00
Cost Per minute		\$0.00045407
Monthly Cost per Subscriber		\$ 0.054
Annual Cost per Subscriber		\$ 0.654
Five Year Cost per Subscriber		\$ 3.269

¹ Subscriber base for year 2000 is taken from FCC's *Third Annual CMRS Report* (1998), Table 5D at B-8. This figure is then multiplied by 85% to represent subscribers in the top 100 MSAs. Forecast for years 2001-2002 represents an assumption of 15% annual growth rate, and for years 2003-2005 a 10% annual growth rate.

² Annual minutes of use is based on assumption of 1440 minutes of use annually per subscriber (120 minutes average airtime use per month).

³ Five-year total implementation cost of \$359,581,715.00 includes \$52,176,343.00 annual recurring costs for 5 years plus \$98,700,000.00 total capital costs, as outlined in TRA's November 24, 1998 Report, *Wireless Number Portability: The Case for LRN Relay*, pages 24-25, filed in FCC CC Docket No. 95-116 on November 24, 1998.